

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

ASHLEY MOODY,)	
)	
Plaintiff,)	
)	No. 2:24-cv-14365-DMM
v.)	
)	
DEANNE CRISWELL, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT**

Under Federal Rule of Civil Procedure 6(b), Defendant Deanne Criswell, former Administrator of the Federal Emergency Management Agency (FEMA), respectfully requests a 60-day extension of time, through April 15, 2025, to answer or otherwise respond to Plaintiff's complaint. As set forth below, good cause exists to grant this motion.

1. On November 13, 2024, Plaintiff filed the complaint asserting claims against Defendant Criswell in her individual capacity under 42 U.S.C. § 1985(3). *See* ECF No. 1.

2. The United States Attorney for the Southern District of Florida was served on December 2, 2024. *See* Fed. R. Civ. P. 4(i)(3).

3. On December 16, 2024, Defendant Criswell was personally served through an agent appointed to receive service of process. *See* Fed. R. Civ. P. 4(e)(2)(C); *see also* Ex. A.

4. Under Federal Rule of Civil Procedure 12(a)(3), Defendant Criswell's deadline to respond to the complaint is February 14, 2025.

5. Good cause exists for the requested extension. Additional time is required to prepare and circulate Defendant Criswell's response, to confer with the client, and to consult internally with the necessary government components.

6. This is Defendant Criswell's first request for an extension of time. No schedule has been entered in this case, and the request would not affect any previously set deadlines.

7. In accordance with Local Civil Rule 7.1(a)(2), undersigned counsel certifies that they have conferred with opposing counsel. By email, Plaintiff stated his¹ response as follows: "Plaintiff does not oppose this motion. But for the sake of judicial efficiency, Plaintiff proposes that the Court consolidate Defendants' responsive-pleading deadlines, rather than extending only Criswell's. Washington's current deadline is April 2, 2025. *See* ECF No. 10."²

For the foregoing reasons, Defendant Criswell respectfully requests an extension of time through April 15, 2025, to answer or otherwise respond to Plaintiff's complaint.

Respectfully submitted,

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¹ This action was filed in the name of Ashley Moody in her official capacity as Attorney General of Florida. Ms. Moody has been succeeded in office by Acting Attorney General John Guard, who is "automatically substituted as a party." Fed. R. Civ. P. 25(d).

² Undersigned counsel represents Ms. Criswell, but not Ms. Washington, and we take no position on Plaintiff's proposal. Ms. Washington has not yet entered an appearance in this case.

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